

8/29/2014

To: Jim McGowan, Stephan Castellanos

CC: Richard Skaff

Subject: HCD 3rd 45-day language

Dear Jim and Stephen: I was reviewing the proposed code changes from HCD re EVCS with Richard Skaff and we were unable to make much sense of the proposed code, and are hoping that you will be able to assist us. The proposed code changes follow with our questions inserted.

Item # 7. HCD proposes to adopt Chapter 4, Section 4.106.4.2.1 with amendments, as follows:

SECTION 4.106

SITE DEVELOPMENT

~~4.106.4.2.2~~ 4.106.4.2.1 Electric vehicle charging station (EVCS) locations.

Construction documents shall indicate the location of proposed EVCS. At least one EVCS shall be located in common use areas and available for use by all residents.

When EV chargers are installed, EVCS required by Section ~~4.106.4.2.1~~ 4.106.4.2.2, Item 3, shall comply with at least one of the following options:

1. The EVCS shall be located adjacent to an accessible parking space meeting the requirements of the California Building Code, Chapter 11A, to allow use of the EV charger from the accessible parking space.

2. The EVCS shall be located on an accessible route, as defined in the California Building Code, Chapter 2, to the building.

Why would there be a choice between providing an accessible parking space meeting the requirements of 11A and Section 4.106.4.2.2 Item 3 or locating such spaces on an accessible route? What is the point of requiring an accessible space per 11A or the lesser requirements of 4.106.4.2.2 if the spaces are not reachable via an accessible route?

Does HCD mean that if Option 1 is chosen, then the parking requirements of 11A are not required?

Does HCD mean that if an accessible route is provided as in Option 2, then accessible parking is not required?

Item # 8. HCD proposes to adopt Chapter 4, Section 4.106.4.2.2 with amendments, as follows:

~~4.106.4.2.1~~ 4.106.4.2.2 Electric vehicle charging station (EVCS) dimensions and slope. The EVCS shall be designed to comply with the following:

1. The minimum length of each EVCS shall be 18 feet (5486 mm).

2. The minimum width of each EVCS shall be 9 feet (2743 mm).

3. One in every 25 EVCS, but not less than one EVCS, shall also have a ~~5-foot (1524 mm)~~ an 8-foot (2438 mm) wide minimum aisle. A 5-foot (1524 mm) wide minimum aisle shall be permitted provided the minimum width of the EVCS is 12 feet (3658 mm).

a. Surface slope for this EVCS and ~~5-foot (1524 mm) wide~~ the aisle shall not exceed 1 unit vertical in 48 units horizontal (2.083 percent slope) in any direction.

Item #8 is moving in the right direction, but still eliminates essential accessible parking features, such as signage, accessible route to the charging station, and necessary accessible features for the charging unit. Is it HCD's intent to require only part of the parking requirements and if so, why? Without proper signage, reach ranges, pounds of operating pressure, sight lines, accessible routes, clear floor space, etc., the parking and the charging unit will not be accessible.

Any assistance you can provide to clarify these proposed code changes will be greatly appreciated. I am trying to formulate input for the disability community, but am not clear as to what HCD is saying in these code change proposals and if I am reading them correctly. Their ISORs are not helpful.

HolLynn (D'Lil)